

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF INDIANA  
INDIANAPOLIS DIVISION**

**RED BARN MOTORS, INC., PLATINUM  
MOTORS, INC., and MATTINGLY AUTO  
SALES, INC., individually and on behalf of  
other members of the general public  
similarly situated,**

**Plaintiffs,**

**v.**

**NEXTGEAR CAPITAL, INC. f/k/a  
DEALER SERVICES CORPORATION,**

**Defendant.**

**Case No. 1:14-cv-01589-TWP-DLP**

**DECLARATION OF LYNN E. SWANSON IN SUPPORT OF PLAINTIFFS' MOTION  
FOR ATTORNEYS' FEES, EXPENSES,  
AND REPRESENTATIVE PLAINTIFFS' INCENTIVE AWARDS**

I, Lynn E. Swanson, state and declare as follows:

1. The facts contained in this declaration are within my personal knowledge. I could and would testify truthfully to these facts if called to do so under oath.
2. I am a co-managing member of Jones Swanson Huddell & Daschbach LLC ("Jones Swanson"). I was appointed co-Class Counsel in the above captioned matter by the Court. (Filing No. 220).
3. Since submitting my Declaration in Support (1) Plaintiffs' Motion for Preliminary Settlement Approval and (2) Plaintiffs' Motion for Attorneys' Fees, Expenses, and Representative Plaintiffs' Incentive Awards, Jones Swanson's unreimbursed litigation costs have increased. They now total \$231,712.56. As before, the expenses for which Jones Swanson seeks reimbursement include consultant fees (expert fees, discovery vendor fees, mediator fees; settlement administration fees); court reporter and transcript fees; filing fees; copying costs; litigation support; and the costs of travel, lodging, and incidental expenses for hearings, depositions, and mediation sessions, as reflected in the table below. This table includes some expenses that are in process.

| <b>CATEGORY</b>                   | <b>AMOUNT</b>       |
|-----------------------------------|---------------------|
| Consultant Fees                   | \$182,003.04        |
| Travel                            | \$7,653.94          |
| Deposition Services               | \$4,400.84          |
| Copies and Litigation Support     | \$22,571.46         |
| Filing Fees and Court Transcripts | \$905.00            |
| WSJ Advertising Fee for Notice    | \$14,178.28         |
| <b>TOTAL</b>                      | <b>\$231,712.56</b> |

I declare under penalty of perjury pursuant to the laws of the United States of America that the foregoing is true and correct.

Executed on August 24, 2021.

s/Lynn Swanson

Lynn E. Swanson

EXHIBIT A